

# WILKERSON ♦ BRYAN

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February 27, 2013

**Via Electronic Comment Filing System**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

**Re: Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc.'s Annual 47 C.F.R. § 64.2009(e) Customer Proprietary Network Information (CPNI) Compliance Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc. (collectively, "Ragland"), please find attached the annual CPNI Compliance Certification for Ragland for the year 2012 in EB Docket No. 06-36, which has been filed electronically via the Federal Communications Commission's Electronic Comment Filing System on this date.

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



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Ragland Long Distance Company, Inc.*  
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Enclosure  
cc: Tim Ford

PEGGY A. DICKINSON  
PRESIDENT



STEPHANIE JACKSON  
VICE-PRESIDENT

STANLEY BEAN  
PLANT SUPERVISOR

*Ragland Telephone Co., Inc.*

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2012

Date filed: February 27, 2013

Name of company covered by this certification: Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc.

Form 499 Filer ID: 804558

Name of signatory: Peggy Dickinson

Title of signatory: President

In response to the Federal Communications Commission's ("Commission") rules and policies, Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc. (the "Companies") state as follows:

I, Peggy Dickinson, certify that I am an officer of the Companies named above, and acting as an agent of the Companies, that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules, as set forth in 47 C.F.R. § 64.2001, *et seq.*

Attached to this certification is an accompanying statement explaining how the Companies' procedures ensure that the Companies are in compliance with the requirements set forth in section 64.2001, *et seq.* of the Commission's rules, including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review.

The Companies have not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The Companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

The Companies represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The Companies also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject them to enforcement action.

Signed



PEGGY A. DICKINSON  
PRESIDENT



STEPHANIE JACKSON  
VICE-PRESIDENT

STANLEY BEAN  
PLANT SUPERVISOR

*Ragland Telephone Co., Inc.*

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT  
OF  
RAGLAND TELEPHONE COMPANY, INC. AND  
RAGLAND LONG DISTANCE COMPANY, INC.

EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Ragland Telephone Company, Inc. and Ragland Long Distance Company, Inc. (hereinafter, collectively "Ragland") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001, *et seq.* on behalf of Ragland:

1. I have personal knowledge that Ragland has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Ragland obtains written approval for the use of its customers' CPNI and that Ragland has notified its customers of their right to restrict Ragland's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Ragland has designated a CPNI Compliance Officer, who is responsible for supervising the use, disclosure, distribution or access to its customers' CPNI, that Ragland has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001, *et seq.* and that Ragland has an express disciplinary process in place to deal with breaches of CPNI.



PEGGY A. DICKINSON  
PRESIDENT



STEPHANIE JACKSON  
VICE-PRESIDENT

STANLEY BEAN  
PLANT SUPERVISOR

*Ragland Telephone Co., Inc.*

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4. I have personal knowledge that Ragland implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.

5. I have personal knowledge that Ragland maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Ragland retains all such records for a minimum period of one (1) year.

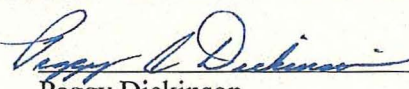
6. I have personal knowledge that Ragland has established a supervisory review process regarding Ragland's compliance with the Federal Communications Commission's rules for outbound marketing situations and that the company maintains records of such compliance for a minimum period of one (1) year. Ragland's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Ragland has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

On behalf of Ragland, I represent and warrant that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission, and acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject Ragland to enforcement action.

Executed on this 27<sup>th</sup> day of February, 2013.

RAGLAND TELEPHONE COMPANY, INC.  
RAGLAND LONG DISTANCE COMPANY, INC.

By:   
Peggy Dickinson  
President